

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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LANDMEN PARTNERS INC., Individually  
And On Behalf of All Others Similarly  
Situating,

Plaintiff,

vs.

THE BLACKSTONE GROUP L.P.,  
STEPHEN A. SCHWARZMAN and  
MICHAEL A. PUGLISI,

Defendants.

Civil Action No. 08-CV-03601 - CM

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TIMOTHY McADAM, Individually And  
On Behalf of All Others Similarly Situated,

Plaintiff,

vs.

THE BLACKSTONE GROUP L.P.,  
STEPHEN A. SCHWARZMAN and  
MICHAEL A. PUGLISI,

Defendants.

Civil Action No. 08-CV-03838 - CM

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**MOTION OF THE BX INVESTOR GROUP TO CONSOLIDATE RELATED ACTIONS;  
TO BE APPOINTED LEAD PLAINTIFF; AND TO APPROVE PROPOSED LEAD  
PLAINTIFF'S CHOICE OF COUNSEL**

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DAVID B. GALCHUTT, Individually And On  
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

THE BLACKSTONE GROUP L.P.,  
STEPHEN A. SCHWARZMAN and  
MICHAEL A. PUGLISI,

Defendants.

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Civil Action No. 08-CV-04110 - CM

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DAVID W. JAKEMAN, Individually And  
On Behalf of All Others Similarly Situated,

Plaintiff,

vs.

THE BLACKSTONE GROUP L.P.,  
STEPHEN A. SCHWARZMAN and  
MICHAEL A. PUGLISI,

Defendants.

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Civil Action No. 08-CV-04064 - CM

Francis Brady and Max Poulter (collectively, “BX Investor Group” or “Movant”) respectfully move this Court for an order: (1) consolidating all related actions; (2) appointing Movant as Lead Plaintiff in this action pursuant to Section 27(a)(3)(B) of the Securities Act of 1933 (“Securities Act”), 15 U.S.C. § 77z-1(a)(3)(B) as amended by Section 101(a) of the Private Securities Litigation Reform Act of 1995 (“PLSRA”), and (3) approving its selection of the law firm of Brower Piven, A Professional Corporation (“Brower Piven”), as Lead Counsel, for the Class.

The BX Investor Group makes this Motion on the belief that it is the most “adequate plaintiff” as defined in the PSLRA because: (1) its members have the largest financial interest in the relief sought by the Class and have incurred substantial losses in the amount of \$612,784.23 as a result of their purchases of Blackstone Group L.P. common units during the Class Period, and (2) its members satisfy the typicality and adequacy requirements of Fed. R. Civ. P. Rule 23.

The BX Investor Group further requests that the Court approve the selection of Brower Piven as Lead Counsel, for the Class. This firm has actively investigated the allegations raised against Defendants. Further, Brower Piven is a nationally-recognized law firm with significant class action, fraud, and complex litigation experience, with the resources to effectively and properly pursue this action.

**WHEREFORE**, for all of the reasons set forth herein and in the Memorandum In Support Of The Motion Of The BX Investor Group To Consolidate Related Actions; To Be Appointed Lead Plaintiff; And To Approve Proposed Lead Plaintiff’s Choice Of Counsel, and the Declaration Of David A.P. Brower In Support Of The Motion Of The BX Investor Group To Consolidate Related Actions; To Be Appointed Lead Plaintiff; and To Approve Proposed Lead Plaintiff’s Choice of Counsel, submitted herewith, the BX Investor Group respectfully requests that this Court: (1) consolidate all related actions with the instant case; (2) appoint the BX Investor Group as Lead Plaintiff; (3) approve the BX Investor Group’s selection of Lead Counsel for the Class; and (4) grant such other and further relief as the Court may deem just and proper.

Dated: June 16, 2008

Respectfully submitted,

**BROWER PIVEN**

A Professional Corporation

/s/ David A.P. Brower

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*Counsel for the BX Investor Group and Proposed  
Lead Counsel for the Class*